





1 understand all of the statements herein, which are true and correct per my personal  
2 knowledge.

3 2. I am the owner of the Defendant Domains <8bo.com>, <16688.com>,  
4 <5123.com>, <boti.com> and <huati.com>.

5 3. In or about, August 2013, I attempted to compile an account report  
6 concerning the domain names I registered with domain name registrar eNom, Inc. ("eNom").  
7 As a result, I learned that my account had been hacked and all of my domains had been  
8 transferred out of my account, including the Defendant Domains. True and correct copies of  
9 the emails and correspondence received from eNom, Inc. concerning the Defendant  
10 Domains are attached hereto as Exhibit D. I immediately contacted eNom to inform them of  
11 the theft. See Exhibit D.

12 4. Prior to the hack, all of the Defendant Domains were held in my eNom  
13 registrar account – 'ljw2288' with the associated email address of 'jiawei2288@139.com'.  
14 The email address listed on the Whois records for all of the Defendant Domains was  
15 'mageejack3366@gmail.com' and I employed a Whois privacy service to protect my  
16 personal information. True and correct copies of the historical Whois records for the  
17 Defendant Domains are attached hereto as Exhibit E.

18 5. After the Defendant Domains were transferred out of my account they were  
19 transferred to other registrars. Defendant Domain <huati.com> was transferred to Cloud  
20 Group Limited and Defendant Domains <8bo.com>, <boti.com>, <16688.com>, and  
21 <5123.com> were transferred to GoDaddy, Inc. See Exhibit D.

22 6. The Defendant Domains were transferred out of my account from "login id  
23 chanlee", according to eNom, and had been pushed to an eNom account by this name prior  
24 to the transfer out of eNom to GoDaddy, Inc. and Cloud Group Limited. See Exhibit D.

25 7. eNom informed me that they sent inquiries to retrieve Form Of Authorization  
26 ("FOA") requests to GoDaddy, Inc. and Cloud Group Limited, the receiving registrars, to



1 learn the specifics of the domain name transfers for each of the Defendant Domains. *See*  
2 Exhibit D.

3 8. Subsequently, eNom informed me that they had received the FOA from  
4 GoDaddy regarding 5123.com, and that the transfer was authorized by the listed registrant of  
5 the Defendant Domain. *See* Exhibit D. Also, on or about August 19, 2013, eNom informed  
6 me that the listed registrant had authorized the transfer of huati.com using the associated  
7 email address 'chanlee999@163.com'.

8 9. I also learned that prior to the transfers, the Whois information for all of the  
9 Defendant Domains had been changed. No longer were all of the Defendant Domains  
10 protected by the privacy service I had employed; Defendant Domain <8bo.com>,  
11 <boti.com>, and <5123.com> listed the associated email address of  
12 'smakeliao@foxmail.com', and <16688.com> listed the associated email address of  
13 'chanlee999@163.com', and the Whois information for <huati.com> was already masked by  
14 another privacy service. *See* Exhibit E.

15 10. I did not transfer Defendant Domain <huati.com> to Cloud Group Limited.

16 11. I did not transfer Defendant Domains <boti.com>, <16688.com>,  
17 <5123.com>, or <8bo.com> to GoDaddy, Inc.

18 12. I did not change the Whois information for any of the Defendant Domains to  
19 the email address 'chanlee999@163.com', or any other email address that may have been  
20 used.

21 13. To date, I have been unable to recover control of the Defendant Domains.  
22

23 RESPECTFULLY SUBMITTED,

24 DATED: April 18, 2015

25 By:                     

26 Jiawei Lu

DECLARATION OF LU  
Case No. 13-cv-05299 NC

Rodenbaugh Law  
548 Market Street  
San Francisco, CA 94104  
415.738.8087

**CERTIFICATION**

I, Lawson Yu, am a resident of Hong Kong, and am a business associate of the declarant, Mr. Jiawei Lu. I have been educated in part in the United States, and am fluent in English and Chinese languages. Throughout this case, I have functioned as an intermediary between Plaintiffs Lu and Guo in this action, on the one hand, and Plaintiffs' counsel Mr. Mike Rodenbaugh on the other hand. I have translated the contents of this Declaration for Mr. Lu, and certify that he understands the meaning of every statement sworn to herein.

RESPECTFULLY SUBMITTED,

DATED: April 18, 2015

By: 

Lawson Yu